

**Clean Harbors Clive, LLC
Draft Permit Renewal
Fact Sheet**

On March 26, 2015, Clean Harbors Clive, LLC submitted an application to the Division of Waste Management and Radiation Control to renew its hazardous waste permit. The current permit was issued on September 30, 2005.

Clean Harbors Clive operates a commercial hazardous waste treatment, transfer and storage facility in Clive, Utah which is located in Tooele County. The facility is located approximated 3.5 miles south of Exit 49, the Clive exit on Interstate 80.

The Division of Waste Management and Radiation Control has completed its review of the permit renewal application. A draft permit has been prepared and is available for review during the public comment period, which begins on July 27, 2017 and will conclude on September 11, 2017, at 5:00 p.m.

A public hearing to receive comment on the draft permit has been scheduled for 6:00 p.m. on Tuesday, August 29, 2017 in the auditorium on the lower level of the Tooele County Building, which is located at 47 South Main Street, Tooele, Utah.

A fact sheet and the draft permit are available for review during the public comment period at the following location:

Division of Waste Management and Radiation Control
Multi Agency State Office Building
195 North 1950 West, 2nd Floor
Salt Lake City, Utah

For the public's convenience, a copy of the fact sheet and draft permit is available online at:
<http://www.hazardouswaste.utah.gov/Public/PublicHearingsandCommentPeriods.htm>

Written comments will be accepted if received by 5:00 p.m. on September 11, 2017 and should be submitted to the address below. Comments can also be hand delivered to the Division address above as long as they are received by 5:00 p.m. on September 11, 2017.

Scott T. Anderson, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Comments can also be sent by electronic mail to: dwmrcpublic@utah.gov. Comments sent in electronic format should be identified by putting the following in the subject line: Public Comment on Clean Harbor Clive, LLC Draft Permit Renewal. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Following the public comment period on the draft Clean Harbor Clive, LLC (Clive) permit, all public comments will be evaluated and where appropriate will be included in the final decision on whether to reissue the permit. A final permit determination will then be made and the corresponding action taken.

Under Utah Code Section 19-1-301.5 a person who wishes to challenge a Permit Order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the director to fully consider the substance and significance of the issue.

The Clive Facility is a permitted transfer, treatment, and storage facility. Clive can manage both RCRA and TSCA waste streams. Waste is received by both rail and truck. The facility is located at latitude 40° 41' 10" North and longitude 113° 08' 00" West. Clive has four permitted storage units and three transfer-only units. All waste sent to the Clive Facility is sent to other Clean Harbor facilities for further treatment and disposal.

The Draft Permit consists of four modules and ten attachments. A summary of each is provided below with the significant changes from the review noted. In June 2016, Title R315 of the Utah Administrative Code waste substantially changed. Most of the changes involved modification of the Code references. This resulted in a document where the numbering system reflected, to a large extent, the numbering system used in the Code of Federal Regulations (CFR). As a result, a citation that began as 40 CFR 264.32(a) became R315-264-32(a). There are exceptions to the changes, but they are few.

In addition, references to the Executive Secretary of the Division of Solid and Hazardous Waste have been changed throughout the Permit to the Director of the Division of Waste Management and Radiation Control.

Module 1, Standard Conditions

A compliance schedule was added to Module 1 that provides adequate time for the Closure Plan to be reviewed and modified.

Also, procedures for Reporting Planned Changes were added.

Module 2, General Facility Conditions

No substantial changes were made in Module 2.

Module 3, Storage and Processing in Containers

A condition was added that provided clarification regarding the time frame (10 days) the Permittee has to process waste that arrives by rail that remains north of the fence line of the facility. Within ten days the waste must be transferred to road transportation containers or trucks and shipped off site or received by the Clive facility.

A section was added that provides storage of bulk solids to the west of Unit 106.

Module 4, Containment Building

The module was modified to add the operational requirements for the storage of waste received in polypropylene bags. This includes the addition of operating requirement pertaining to the management of polypropylene bags in the Containment Building.

Attachment 1, Waste Analysis Plan (WAP)

A section containing definitions was added to the WAP.

Table 2 - Pre-acceptance, Storage and Verification (Fingerprint) Analyses was updated.

Table 3 – Methods (Fingerprint) and Tolerance Limits was added to the WAP.

Table 4 – Analytical Parameters and Associated Methods was updated to reflect current analytical methods.

Since analytical methods for Clive are conducted by the Clean Harbors Aragonite facility laboratory, the Quality Assurance Plan from the Clean Harbors Aragonite facility has been incorporated into the WAP. Previously, it had been referenced.

Attachment 2 - Security

The employee position responsible for providing access to the facility was changed from Security Personnel to Waste Receiving Personnel.

The operation of the secondary gates present in the security fence of the facility was changed from magnetic locks to chain and padlock with a key box. All employees have access to the key box.

Attachment 3 - Inspections

The Inspection Matrix was modified to include inspections of the Containment Building.

Attachment 4 – Personnel Training

No significant changes were made.

Attachment 5 – Preparedness and Prevention

No significant changes were made.

Attachment 6 – Contingency Plan

Changes were made to the Emergency Coordinator section, specifying that the emergency coordinator and alternates were Clive-assigned Clean Harbors' employees. Previously, Clean Harbors Aragonite employees were the Emergency Coordinator and alternates.

The Designated Gathering Points, where employees or other people on-site go in the event of an emergency, were redefined.

The list of services that may be utilized in the event of an emergency was updated and reformatted.

The Emergency Coordinator list was updated.

Attachment 7 – Closure Plan

The Closure Plan is subject to Module 1 section titled Compliance Schedule. The Closure Plan will be modified in its entirety and submitted to the Director of the Division of Waste Management and Radiation Control on or before December 31, 2017.

Attachment 8 – Container Management

Unit 101 was added to the attachment. Unit 101 is used as a 10-day truck to truck transfer facility for small containers (<120 gallons) and intermediate bulk containers (<350 gallons, but >120 gallons).

The management of intermediate bulk containers (<350 gallons, but >120 gallons) was added to Unit 105, Unit 604 and Unit 106.

An alpha-numeric coordinate system was added to Units 604 (Truck Wash) and Unit 105 (Thaw Shed) to aid with tracking when intermediate bulk containers and small containers are stored in the units.

Attachment 9 – Design Drawings

The title blocks of all drawings are being modified to indicate the ownership by Clean Harbors. Most of the drawings were prepared prior to the purchase by Clean Harbors.

Attachment 10 – Management of Waste in Containment Building

No significant changes were made to this attachment.